

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. 2116**

**CERTIFICATION OF COUNSEL REGARDING NOTICE OF FILING OF FIFTEENTH  
POST-CLOSING DESIGNATION NOTICE**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On January 2, 2025, the Bankruptcy Court entered the *Order (I) Approving the Asset Purchase Agreement, (II) Authorizing and Approving the Sale of Certain of the Debtors’ Assets Free and Clear of All Claims, Liens, Rights, Interests, Encumbrances, and Other Assumed Liabilities and Permitted Encumbrances, (III) Authorizing and Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief* [D.I. 1556] (the “**Sale Order**”).<sup>2</sup>

2. On February 27, 2025, pursuant to the Sale Order, the Debtors filed the *Notice of Filing of Fifteenth Post-Closing Designation Notice* [D.I. 2116] (the “**Notice**”). Attached

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

<sup>2</sup> Capitalized terms not defined herein are used as defined in the Sale Order.

as Exhibit A to the Notice was the *Notice of Designation of Designated Asset* from Gordon Brothers Retail Partners, LLC (“**GBRP**”) that designated forty of the Debtors’ unexpired leases of nonresidential real property (the “**Leases**” on the “**Lease Schedule**”) for assumption by the Debtors and assignment to the Ollie’s Bargain Outlet, Inc. (“**Ollies**”), and identified the landlord associated with each Lease (collectively, the “**Landlords**”).

3. Attached as Exhibit C to the Notice was a proposed form of order (the “**Proposed Order**”) approving the assumption and assignment for the Leases scheduled on the Lease Schedule and the Cure Costs were set forth on Exhibit B to the Notice.

4. Pursuant to the Notice, objections to the assumption and assignment of the Leases were to be filed no later than March 14, 2025, at 4:00 p.m. (ET).

5. To date, the Debtors, GBRP and Ollie’s have not received comments or objections, formally or informally, from landlords for twenty-five of the designated Leases set forth on the Notice (the “**CNO Leases**”). The landlords for the remaining fifteen Leases (the “**Remaining Leases**”) have commented or objected, either formally or informally, to the assumption and assignment of their Leases to Ollie’s. The Remaining Leases have been removed from the Lease Schedule (the “**Modified Lease Schedule**”).

6. Pursuant to paragraphs 45 and 46 of the Sale Order, the fourteen (14) day period to file objections with the Court to the relief set out in the Proposed Order has expired, and the Debtors, GBRP and Ollie’s now request that the Court enter the Proposed Order solely with respect to the Modified Lease Schedule and the CNO Leases. The Debtors, GBRP and Ollie’s continue to work with the objecting Landlords and reserve all rights with respect to the Remaining Leases.

7. In addition to the Modified Lease Schedule, the Debtors have modified the Proposed Order to make certain non-substantive confirming edits and to clarify that the Debtors will not abandon third party property and to remove the representation that the Debtors are unaware of any third parties with interests in the FF&E (as defined in the Proposed Order). The Debtors submit that these changes do not prejudice the Landlords and no further notice is necessary.

8. The revised Proposed Order with the Modified Lease Schedule is attached as **Exhibit 1** hereto. For the convenience of the Court and all parties in interest, a redline reflecting the changes made to the revised Proposed Order and the Modified Lease Schedule is attached hereto as **Exhibit 2**.

9. Counsel to GBRP and Ollie's have reviewed the revised Proposed Order with Modified Lease Schedule and confirmed their consent to its entry.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

*[Signature page follows]*

Dated: March 19, 2025  
Wilmington, Delaware

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